



**TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY PERMIT NO. 73219**

MI Metals, Inc.

I. INTRODUCTION

This Class II air quality operating permit is issued to MI Metals, Inc., the Permittee, for the continued operation of an aluminum extrusion manufacturing facility located in Yavapai County in Prescott Valley, Arizona. This permit is a renewal of Air Quality Permit # 59375.

A. Company Information

1. Facility Name: MI Metals – Prescott Valley Plant
2. Facility Location: 7555 E. State Route 69, Suite B, Prescott Valley, AZ
3. Mailing Address: 301 Commerce Blvd., Oldsmar, FL 34677

B. Attainment Classification

The facility is located in an area that is classified as an attainment area for all criteria pollutants.

II. PROCESS DESCRIPTION

A. Processes

Aluminum billets are heated then extruded through a horizontal hydraulic extrusion press to form extrusions, which are transferred to an oven for homogenization. Extrusions are then either shipped to customers or transferred to the paint line for coating. At the paint line, extrusions are washed in aqueous solution, oven dried, electrostatic coated in two spray paint booths, and paint cured in an oven. Solvents are used to clean up spray paint equipment and overspray in the paint booths. Die forms used in the process are cleaned in heated caustic baths to remove residual product.

B. Control Devices

Two spray booths are used to control emissions from spray painting operations. The facility also maintains records to demonstrate compliance with voluntarily accepted emission limitations for volatile organic compounds (VOCs) and Federal hazardous air pollutants (HAPs).

III. EMISSIONS

Table 1: Potential Emissions

| Pollutant | Emissions (tons per year) |
|---------------------------------|--------------------------------------|
| PM | 0.91 |
| PM₁₀ | 0.91 |
| PM_{2.5} | 0.91 |
| NO_x | 12 |
| CO | 10 |
| SO₂ | 0.07 |
| VOC* | ≤ 90 |
| Combined Federal HAPs* | ≤ 22.5 |
| Individual Federal HAPs* | ≤ 9 |

* Voluntarily accepted emission limitations.

IV. MINOR NEW SOURCE REVIEW

This renewal permit does not result in any changes that would increase the facility's PTE. As such it is not subject to Minor New Source Review.

V. APPLICABLE REGULATIONS

Table 2 displays the applicable requirements for each permitted piece of equipment along with an explanation of why the requirement is applicable.

Table 2: Verification of Applicable Regulations

| Unit | Control Device | Rule | Discussion |
|---|---|--|---|
| Aging Oven | None | A.A.C. R18-2-724.A A.A.C. R18-2-724.C A.A.C. R18-2-724.J | These rules are applicable to fossil-fuel fired equipment at industrial and commercial installations which are less than 250 MMBtu/hr capacity, but on the aggregate at any premises are rated at greater than 0.5 MMBtu/hr, and in which fuel is burned for the primary purpose of producing steam, hot water, hot air or other liquids, gases, or solids and in the course of doing so the products of combustion do not come into direct contact with process materials. |
| Billet Furnace, Washer Tank Heater, Drying Oven, Baking Oven, Paint Room Heater, Hook Burn-Off Oven and Caustic Die Tank Heater | None | A.A.C. R18-2-730.A.1.a A.A.C. R18-2-730.B A.A.C. R18-2-730.D A.A.C. R18-2-730.F A.A.C. R18-2-730.G | These rules are applicable to unclassified sources not otherwise subject to standards of performance under Articles 7, 9, or 11 of A.A.C. Title 18, Chapter 2. |
| | | A.A.C. R18-2-702.B.3 A.A.C. R18-2-702.C | These rules are general provisions for all existing, stationary, point sources not otherwise subject to opacity standards relating to specific types of sources covered elsewhere in Chapter 2 of A.A.C. Title 18. |
| Spray Paint Line with Two Paint Booths (and other periodic spray painting activities) | Enclosures with controls containing no less than 96% of overspray | A.A.C. R18-2-727 | This rule is applicable to any spray painting operation. |
| | | A.A.C. R18-2-702.B.3 A.A.C. R18-2-702.C | These rules are general provisions for all existing, stationary, point sources not otherwise subject to opacity standards relating to specific types of sources covered elsewhere in Chapter 2 of A.A.C. Title 18. |
| Fugitive dust sources | Water Trucks Dust Suppressants | A.A.C. R18-2 Article 6 A.A.C. R18-2-702 | These standards are applicable to all fugitive dust sources at the facility. |

| Unit | Control Device | Rule | Discussion |
|----------------------------------|---|--|--|
| Abrasive Blasting | Wet blasting; Dust collecting equipment; Other approved methods | A.A.C. R-18-2-702 A.A.C. R-18-2-726 | These standards are applicable to any abrasive blasting operation. |
| Spray Painting | Enclosures | A.A.C. R18-2-702 A.A.C. R-18-2-727 | This standard is applicable to any spray painting operation. |
| Demolition/renovation operations | N/A | A.A.C. R18-2-1101.A.8 | This standard is applicable to any asbestos related demolition or renovation operations. |

VI. PREVIOUS PERMIT CONDITIONS

Permit No. 59375 was issued on July 9, 2014, for the continued operation of this facility. Table 3 below illustrates if a section in Permit No. 59375 was revised or deleted.

Table 3: Permit No. 59375

| Section No. | Determination | | Comments |
|----------------------|---------------|--------|--|
| | Revised | Delete | |
| Att. A. | X | | General Provisions - Revised to represent most recent template language. |
| Att. B.I, IV, and VI | X | | Specific Conditions - Facility Wide Requirements, Fugitive Dust Requirements and Other Periodic Activities - Revised to represent most recent template language. |
| Att. B.II and III | X | | Specific Conditions - Furnaces, Ovens, Heaters & Miscellaneous Fuel Burning Equipment and Spray Painting Operations – Revised to represent the most recent template language for opacity monitoring. |
| Att. B.V | | X | Specific Conditions - Mobile Source Requirements – Deleted. |

VII. MONITORING REQUIREMENTS

A. Facility Wide

- The Permittee is required to keep daily logs of total usage of all VOC and Federal HAPs containing compounds (in gallons).
- The Permittee is required to calculate and record monthly totals of VOC and Federal HAP emissions at the end of every calendar month from usage levels of the compounds and emission factors from Material Safety Data Sheets. Copies of Material Safety Data Sheets for all compounds at the facility shall be available on-site.
- The Permittee is required to update and record rolling 12-month totals of VOC and Federal HAP emissions at the end of every calendar month to show compliance with the voluntarily accepted VOC and Federal HAP emission limitations in the permit.

4. The Permittee is required to submit rolling 12-month totals of VOC and Federal HAP emissions and submit reports of all monitoring activities required by Attachment “B” along with the semiannual compliance certifications.
5. The Permittee is required to maintain on-site records of the manufacturer’s specifications or the Operation and Maintenance Plan for all equipment listed in Attachment “C” of the permit.
6. The Permittee is required to maintain on-site records of all emission related maintenance performed on the emission units.

B. Fugitive Dust

1. The Permittee is required to keep record of the dates and types of dust control measures employed.
2. Every quarter the Permittee is required to show compliance with the opacity standards by performing quarterly survey of visible emission from fugitive dust sources according to Attachment “B” Condition I.A.1. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed the applicable standard.
3. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
4. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.

C. Periodic Activities

1. The Permittee is required to record the date, duration and pollution control measures of any abrasive blasting project.
2. The Permittee is required to record the date, duration, quantity of paint used, any applicable MSDS, and pollution control measures of any spray painting project.
3. The Permittee is required to maintain records of all asbestos related demolition or renovation projects. The required records include the “NESHAP Notification for Renovation and Demolition Activities” form and all supporting documents.

VIII. COMPLIANCE HISTORY

This facility received three air quality inspections during the 5-year term of the previous permit (Permit # 59375). No violations were identified during the facility inspections.

IX. LIST OF ABBREVIATIONS

| | |
|-----------------|-------------------------------|
| A.A.C. | Arizona Administrative Code |
| Btu | British Thermal Units |
| HAP | Hazardous Air Pollutant |
| hr | Hour |
| MMBtu | Million British Thermal Units |
| NO _x | Nitrogen Oxide |



NO₂ Nitrogen Dioxide
 PM..... Particulate Matter
 PM₁₀ Particulate Matter Nominally less than 10 Micrometers
 PTE Potential-to-Emit
 SO₂..... Sulfur Dioxide
 TPY Tons per Year
 VOC Volatile Organic Compound
 yr Year

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